Supreme Court, U.S.
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No. 96-280

In The

Supreme Court of the United States

October Term, 1995

GORDON HAYGOOD and JUDY HAYGOOD,

Petitioners,

vs.

SCOTT SAVAGE, in his individual and official capacity as a law enforcement officer with the Fayette County Sheriff's Department,

Respondent.

On Petition For A Writ Of Certiorari To The United States Court Of Appeals For The Eleventh Circuit

RESPONDENT'S BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

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QUESTION PRESENTED

Whether the Petition meets the requirements of Supreme Court Rule 10 governing *certiorari* when the Eleventh Circuit Court of Appeals has found that the omission of certain facts from an affidavit given by a law enforcement officer to obtain a search warrant was neither material nor violative of clearly established law, thereby affording qualified immunity to the officer?

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OPINIONS BELOW

Opinions were issued in this case by the United States District Court for the Northern District of Georgia and the Eleventh Circuit Court of Appeals. The Eleventh Circuit opinion is reported at 70 F.3d 92 (11th Cir. 1995). The Eleventh Circuit also later denied Petitioners' Petition for Rehearing and Suggestion for Rehearing *En Banc*. Each opinion and ruling is attached to Petitioners' Petition for Writ of *Certiorari* as appendices.

STATUTORY PROVISION INVOLVED

Petitioners have cited the relevant statutory provision involved.

I. STATEMENT OF THE CASE

Respondent respectfully opposes the Petition for Writ of *Certiorari* on the grounds that the Petitioners failed to address the issue of qualified immunity with which the Eleventh Circuit Court of Appeals was solely concerned in this case. Instead, Petitioners seek *certiorari* for the advancement of a proposition that was settled by this Court almost twenty years ago in *Franks v. Delaware*, 438 U.S. 154, 98 S.Ct. 2674 (1978). Specifically, the Petition advances only the general principle that false search warrant affidavits and affidavits from which *material* facts are deliberately omitted are violative of the Fourth Amendment to the United States Constitution. For this reason

alone, this Court's consideration on *certiorari* is completely unnecessary.

Although not precisely stated, Petitioners appear also to claim that a reasonable police officer should never omit *any* fact when seeking a search warrant from a magistrate. This argument ignores the "materiality" element of the *Franks, supra,* rationale.

Unfortunately, these arguments are not germane to the Eleventh Circuit's decision in this case. The Eleventh Circuit's decision was singularly concerned with the issue of qualified immunity. As such, the Eleventh Circuit carefully analyzed the facts in the context of *Harlow v. Fitzgerald,* 457 U.S. 800, 102 S.Ct. 2727 (1982) and its progeny. Petitioners do not contend the Eleventh Circuit employed the wrong analysis or improperly interpreted this Court's decisions on the issue of qualified immunity. That analysis, as discussed herein, specifically rejects reliance upon the general constitutional principles, as advanced by Petitioners.

The Eleventh Circuit conducted a *de novo* qualified immunity analysis. It properly examined the specific facts and pre-existing law in order to determine whether an objectively reasonable law enforcement officer would have known his actions were violative of the United States Constitution. As such, the holding is extremely fact-specific and limited. Consequently, the Eleventh Circuit's decision has minimal application to disparate factual situations.

A. Statement of Facts

The Opinion of the Eleventh Circuit Court of Appeals correctly sets forth the facts of this case. The Eleventh Circuit Court of Appeals conducted a *de novo* review of the facts of the case and, in its Opinion, outlined the facts surrounding the controlled drug buy, the facts supporting the Officer's affidavit, and those omitted from the affidavit. Thus, in the interest of efficiency, Respondent respectfully directs the Court's attention to the Eleventh Circuit's Opinion attached to Petition for Writ of *Certiorari* as Appendix B. *See also, Haygood v. Johnson, et al.*, 70 F.3d 92, 93-94 (11th Cir. 1995).

B. Misstatements of Fact

Pursuant to United States Supreme Court Rule 15.1, Respondent brings to the Court's attention the following misstatements of fact contained in the Petition.

Contrary to Petitioners' assertion, informant Hurston had not previously been engaged by the police in fraudulent controlled buys by the county or the Drug Task Force which employed Respondent. It is true Hurston had been so involved in other jurisdictions, but Respondent did not know this prior to the execution of the warrant.

Second, Petitioners' reference to Respondent's knowledge prior to obtaining the search warrant is incorrect. *See* Petition, p. 5. Before he applied for the search warrant, Respondent was not aware of the fact that the substance purportedly purchased by the informant weighed more than an "eight ball." In fact, qualifying his statement with the fact that drug transactions are not

typically precise and scientific in nature, Respondent testified that the quantity looked like an "eight ball" to him.

Third, the criminal background check Respondent conducted on the informant was not "inconclusive" as Petitioners state. Rather, Respondent checked and found no criminal history for the informant.

Last, the Eleventh Circuit conducted a *de novo* review of the facts and law in this case. Accordingly, Petitioners' repeated reference to the facts set forth in the District Court's Opinion is improper.

II. REASONS WHY THE WRIT SHOULD BE DENIED

Petitioners contend that the Eleventh Circuit Opinion is far-reaching and has a negative effect upon the Fourth Amendment. It is in reality, however, a limited and fact-specific decision. The Court's holding is a literal interpretation of the meaning of "clearly established law" under *Harlow v. Fitzgerald, supra,* in the context of the specific facts of this case.[1]

The Eleventh Circuit merely held that where a law enforcement officer's affidavit in support of a search warrant following an apparently flawless controlled drug buy omits the fact that the informant initiating the buy

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[1] As this Court is well aware, the purpose of qualified immunity is to shield government officials exercising discretionary functions from civil damages when their conduct does not violate *clearly established statutory or constitutional rights* of which a reasonable person would have known. *Harlow,* 457 U.S. 800, 818, 102 S.Ct. 2727, 2731 (1982) (emphasis added).

used an alias, the tape recorder appeared to have malfunctioned, and the purchase procured two grams more of cocaine than expected, was not clearly contrary to clear, pre-existing, and established law. This being the case, the Eleventh Circuit opined that a reasonable officer standing in the shoes of Respondent would not have known he was violating Petitioners' constitutional rights.

Additionally, a plain reading of various portions of the decision make it clear that the Eleventh Circuit did not view its decision as having far-reaching, precedential value. It contains no sweeping platitudes, but merely deals with the three small factual omissions from a warrant affidavit in the context of the standard for evaluating qualified immunity. Discussed *infra*.

Specifically, the Eleventh Circuit stated:

> The district did not conclude (nor could it rightly have) that Plaintiff met the burden of showing that, *in light of pre-existing law,* the facts omitted were clearly material (that is, that the facts omitted clearly would have negated probable cause if those facts had been included). We, looking at the pre-existing law, hold that the facts omitted here were not so clearly material that every reasonable law officer would have known that their omission would lead to a search in violation of federal law.

Haygood v. Johnson, 70 F.3d 92, 95 (11th Cir. 1995).

The Eleventh Circuit then discussed the specific omissions. According to the Circuit Court, Hurston "had used an alias, that the tape recorder had shut off, and that the quantity of cocaine allegedly purchased exceeded the expected quantity by about fifty percent." *Id.* at 94. The

Court merely held that these facts considered either alone or in combination "might be insufficient to negate probable cause in these uncommon and specific circumstances" due to the fact that Respondent witnessed a "typical drug deal" "by all appearances." *Id.* The Eleventh Circuit properly concluded that there were no pre-existing decisions from Georgia, the Eleventh Circuit, or the present Court that were similar to the facts in this case. Thus, there was no clearly established law which was violated for purposes of the qualified immunity analysis.

The Eleventh Circuit analyzed the factual omissions and concluded that such omissions did not vitiate probable cause. It further concluded that the law was not established that the omissions were so material that a reasonable officer would know he was violating constitutional rights and thereby lose entitlement to qualified immunity.

Petitioners do not even address the Eleventh Circuit's analysis of the qualified immunity issue. Instead, Petitioners advance the general rule of law with respect to search warrant applications. The issue here is not generally whether police officers may present false affidavits or withhold material information from affidavits. As discussed below, the pertinent inquiry is whether Respondent is entitled to qualified immunity based upon the specific facts in light of the clearly established law as it existed at the time the warrant issued.

A. The Eleventh Circuit's Decision Follows the Directives of This Court.

Petitioners claim the Eleventh Circuit erred by creating a conflict with this Court, itself and other jurisdictions. Specifically, Petitioners argue error because the law was "clearly established" that material omissions from warrant affidavits may violate the Fourth Amendment. Respondent does not quarrel that this was and is the law. However, that is not the pertinent inquiry for purposes of the qualified immunity analysis.

Petitioners are incorrect in their contention that the "clearly established right or law" at issue in the qualified immunity analysis is a general one – the right to be free from searches lacking in probable cause. Certainly, the existence of the Fourth Amendment to the United States Constitution establishes this general "right." However, this is not "clearly established law" to which *Harlow v. Fitzgerald, supra,* and its progeny refer.

The "clearly established" law which would deprive Respondent of his right to qualified immunity is that which is so specific and clear that a reasonable officer standing in the shoes of Respondent would have known he was violating the Fourth Amendment. The "objective reasonableness" standard established by this Court was intended to allow the issue of qualified immunity to be decided as a matter of law.

The doctrine of qualified immunity is intended to afford broad qualified immunity protection to all "unless the government agent's acts are so obviously wrong in light of pre-existing law that only the plainly incompetent or those who knowingly violate the law would have done

such a thing." Otherwise, the government agent is immune from suit. *Malley v. Briggs*, 475 U.S. 335, 341, 106 S.Ct. 1092, 1096 (1986). This means that "government agents are not always required to err on the side of caution," *Davis v. Scherer*, 468 U.S. 183, 196, 104 S.Ct. 3012, 3020 (1984), for this could have a chilling effect on law enforcement.

In *Malley v. Briggs*, 475 U.S. 335, 106 S.Ct. 1092 (1986), this Court examined the "reasonableness" standard specifically in the context of warrants. The *Malley* decision states: "only where the warrant application is so lacking in indicia of probable cause as to render the official's belief in its existence unreasonable will the shield of immunity be lost." *Malley*, 475 U.S. at 345, 106 S.Ct. at 1098. The court in *Malley* further stated that when officers have a search warrant, the officers will lose "the shield of immunity" *only* "if, on an *objective* basis, it is obvious that no reasonably competent officer would have concluded that a warrant should issue; but if officers of reasonable competence could disagree on this issue, immunity should be recognized." *Id.* 475 U.S. at 341, 106 S.Ct. at 1096.[2]

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[2] On the issue of probable cause, this Court has stated:

> "It is inevitable that law enforcement officials will be in some cases reasonably but mistakenly conclude that probable cause is present, and . . . in such cases those officials . . . should not be held personally liable." *Anderson v. Creighton*, 438 U.S. 632, 641, 107 S.Ct. 3034, 3040 (1987).

More important to the issue in this case is the interpretation of the *Harlow* requirement that the acts be violative of "clearly established law." This Court explained the rule in *Anderson v. Creighton*, 438 U.S. 632, 107 S.Ct. 3034 (1987). In order for a right to be "clearly established," the contours of the right must be sufficiently clear that a reasonable official would understand that what he is doing violates that right. 438 U.S. at 640, 107 S.Ct. at 3039 (1987).

For the law to be clearly established to the point that qualified immunity does not apply, the law must have been *earlier* developed in such a concrete way to make it obvious to all reasonable actors in the defendant's place, that what he is doing violates federal law. *Id.* Thus, under the definition of "reasonableness" dictated by *Malley* and the "clearly established law" described by *Anderson*, the qualified immunity analysis is an objective formulation which requires not only the determination of the protected right, but also a decision of how particularly the right must be specifically stated.

In fact, the *Anderson* decision addresses the specific problem with Petitioners' analysis. In *Anderson*, this Court directed that courts must not permit plaintiffs to discharge their burden[3] by referring to general rules and to the violation of abstract rights. *Id.* at 639-41, 107 S.Ct. 3038-39. (Even though the general right allegedly violated – the right to be free from warrantless searches without

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[3] Once defense of qualified immunity is raised, plaintiffs bear the burden of showing their federal rights were clearly established. *Mitchell v. Forsyth*, 472 U.S. 511, 528, 100 S.Ct. 2086, 2816 (1985).

probable cause – was clearly established, lower court should have considered whether the circumstances with which defendant was confronted did not constitute probable cause.)

The Eleventh Circuit analyzed Respondent's entitlement to qualified immunity in this case in light of its recent decision in *Lassiter v. Alabama A&M University*, 28 F.3d 1146 (11th Cir. 1994) wherein the court provided clarification of the standards explained by this Court in *Harlow*, *Anderson*, and *Malley*. In keeping therewith, the Eleventh Circuit focused on the actual, on the specific, and on the details of the concrete cases. It held here that the law was not clearly established such that every reasonable officer would have known that in this witnessed controlled buy situation, the three omitted facts were material such that their omission from the affidavit was so "obviously wrong" so as to deprive Respondent from entitlement to qualified immunity. *Haygood v. Johnson*, *supra*. The Eleventh Circuit properly noted that there are no cases which would have established a "bright line" standard at the time of the application for the search warrant. Therefore, a reasonable police officer not on notice that the facts omitted from the affidavit were material omissions or, if included, would negate probable cause.[4]

Last, the cases relied upon by Petitioners on the issue of "clearly established" law are not applicable and create no conflict with the Eleventh Circuit's opinion below. For

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[4] There is abundant case law supporting Respondent's actions. (See discussion *infra*.)

example, *Franks v. Delaware*, 438 U.S. 154, 98 S.Ct. 2674 (1978), the landmark case on the issue of challenging the validity of a warrant, is not in conflict with the Eleventh Circuit's decision. *Franks* stands for the proposition that when false statements are present in a warrant (which is not alleged here), the warrant is subject to further scrutiny by way of hearing.

West Point-Pepperell, Inc. v. Donovan, 689 F.2d 950 (11th Cir. 1982) is not analogous. That case involved an administrative OSHA search. The Eleventh Circuit held that the claimant had not offered proof of intentional or reckless omissions from the affidavit and thus was not entitled to a *Franks* hearing. *Id.* at 959.

United States v. Martin, 615 F.2d 318 (5th Cir. 1980) also stands for the proposition that in order to vitiate a warrant there must be evidence of deliberate falsehood. Negligence is insufficient. *Id.* at 329.

In sum, Petitioners miss the point. The law must have been clearly established such that Respondent would have known that the three omissions were material despite the fact that he witnessed what appeared to be a legitimate and typical drug transaction. Moreover, Petitioners did not meet their burden of proving that the omitted facts were material to the determination of probable cause. Consequently, Respondent is entitled to qualified immunity.

Additionally, Petitioners cite no case which is analogous or which indicates that the law was such that every reasonable law enforcement officer should have known that to omit these facts would be violative of Petitioners' constitutional rights. Likewise, Petitioners cite no case

which says that these omitted facts, if added to the affidavit, would negate probable cause.

Accordingly, the Eleventh Circuit utilized the proper analysis and reached the right conclusion. Respondent is entitled to qualified immunity.

B. The Clearly Established Law Supported Respondent's Acts.

Although not specifically addressed in the Eleventh Circuit opinion, it is also important to note that the clearly established law at the time actually supported Respondent's act with respect to the warrant. In this case, the controlled buy specifically established probable cause. Although this Court has never addressed the issue, it is well established that controlled buys are an approved method of establishing probable cause particularly when the credibility of information received by law enforcement officials from informants is in question. *See, United States v. Clipper*, 973 F.2d 944, 951 (D.C. Cir. 1992) ("If there is any doubt about the reliability of [information involving illegal drug transactions], the police can limit their response to surveillance or engage in 'controlled buys'.").

In fact, courts have universally found probable cause based on controlled buys similar to the one in the instant case. For example, in *United States v. Cook*, 949 F.2d 289 (10th Cir. 1991), the court found probable cause to search defendant's apartment based on a controlled buy that was quite similar to the controlled buy in the instant case:

> The confidential informant offered to participate in a controlled buy of cocaine at the apartment. Officer McCrory searched the informant for money and drugs, and upon ascertaining that he had neither, gave him twenty dollars and watched him enter Mr. Cook's apartment. Upon the confidential informant's return, Officer McCrory again searched him for money and drugs. Officer McCrory did not find the twenty dollars, but he did find a white rock that appeared to be cocaine.

Id. at 292. In the *Cook* case, the court found that probable cause to search Mr. Cook's apartment was present even though the substance bought by the confidential informant was not tested prior to seeking the search warrant. *Id.* at 293. *See, United States v. Carty*, 993 F.2d 1005 (1st Cir. 1993).

In *United States v. Garcia*, 983 F.2d 1160 (1st Cir. 1993), a police detective received information from an informant that drug trafficking was being conducted from the second floor apartment on a particular street. *Id.* at 1166. To corroborate this information, the detective executed a "controlled buy," using an informant. *Id.* The informant was searched for contraband, then given a sum of money. The detective watched as the informant entered the building, then exited from the same door a few minutes later. The informant handed the detective a quantity of cocaine, and the detective again searched the informant. *Id.* at 1166-67. The detective then obtained a search warrant for the second story apartment. *Id.* at 1162. The criminal defendant argued that there was no probable cause to execute the search. The court explained the criminal defendant's argument against probable cause as follows:

> Defendant argues that the affidavit is inadequate because the detective failed to establish the reliability of the confidential informant. . . . Detective Zammarelli confirmed the information with which the confidential information provided him by carrying out a "controlled buy". Given its greatest force, defendant's argument against this corroboration was that one and the same informant was the source of the information and the actor in the "controlled buy", and that the informant might have stashed cocaine elsewhere in the building out of sight of the detective. This possibility, defendant posits, undercuts the reliability of the informant.

Id. at 1167. The court flatly rejected this argument, stating that, "[a]lthough defendant's argument is possible, it is not probable and strains credulity". *Id.* The court, therefore, held there was probable cause to believe that cocaine was being sold from the apartment. *Id.*

In essence, what happened here is that the officers corroborated an untested informant's information that Petitioner Gordon Haygood was selling cocaine by witnessing what certainly appeared to be a classic drug transaction. Thus, the case law establishes that this fact situation established probable cause to believe that Petitioners were, in fact, selling cocaine, a fact recognized by the Eleventh Circuit in this case.

In *United States v. Robinson*, 756 F.2d 56 (8th Cir. 1985), the court held that an informant's statement that Mr. Robinson was selling marijuana from his apartment was "corroborated" by officers' observation of "persons going to Robinson's door and making exchanges of

unknown items". *Id.* at 59-60. In *United States v. McFarland*, 633 F.2d 427 (5th Cir. 1980), the court found that there was probable cause to arrest a criminal defendant when a man got into the defendant's car, "apparently empty-handed", and then left the car several minutes later carrying a package containing cocaine. *Id.* at 429. Similarly, in the instant case, the fact that an informant got into plaintiff's vehicle "apparently empty-handed" and left the vehicle with a substance appearing to be cocaine established probable cause to search plaintiff's residence. *See also, United States v. Smith*, 914 F.2d 565 (4th Cir. 1990) (court found probable cause where "the informant was observed entering a room with no cocaine in his possession, exiting the room, and then turning the cocaine over" to officers). *See also, United States v. Williams*, 481 F.2d 725 (8th Cir. 1973); *United States v. Singer*, 732 F.2d 631 (8th Cir. 1984).

Thus, Petitioners overlook the fact that the "controlled buy" established probable cause to believe that Petitioner Gordon Haygood had violated drug laws and that these cases affirmatively establish Respondent's immunity from civil liability. Instead, the Petitioners argue that probable cause was negated because Respondent should have investigated further before applying for a search warrant.

It is well established that "[h]aving uncovered sufficient evidence to establish probable cause, [the officers] had no constitutional obligation to conduct any further investigation in the hopes of uncovering potentially exculpatory evidence." *Simkunas v. Tardi*, 930 F.2d 1287, 1292 (7th Cir. 1991) (citation omitted); *Schertz v. Waupaco County*, 875 F.2d 578, 583 (7th Cir. 1989) ("once police

officers have discovered sufficient facts to establish probable cause, they have no constitutional obligation to conduct any further investigation in the hopes of uncovering potentially exculpatory evidence"). *See also, Baker v. McCollan*, 443 U.S. 137, 99 S.Ct. 2689 (1979) ("Given the requirements that arrest be made only on probable cause and that one detained be accorded a speedy trial, we do not think a sheriff executing an arrest warrant is required by the Constitution to investigate independently every claim of innocence").

In sum, not only did Respondent not violate any "clearly established" law, the law supported his acts. Unless this Court is inclined to make wholesale changes to the general law of qualified immunity, *certiorari* should be denied.

III. CONCLUSION

The Petition for Writ of *Certiorari* does not present an issue worthy of review by this Court. The parameters of qualified immunity have been repeatedly enunciated by this Court. The Eleventh Circuit strictly followed this Court's mandate on this issue and held Respondent was entitled to qualified immunity under the facts presented. In fact, the Eleventh Circuit opinion, by its own terms, is limited in scope to the specific facts involved and does not have the general and far-reaching impact as Petitioners suggest. Consequently, the opinion has little precedential value other than reiterating the proper analysis involved in the qualified immunity inquiry, with which

Petitioners, apparently, do not quarrel. As such, Respondent respectfully submits that the Petition for Writ of *Certiorari* should be denied.

Dated: September 19, 1996.

Respectfully submitted,

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